

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:21-CV-463-JRG
	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,	)	
INC., SAMSUNG SEMICONDUCTOR,	)	
INC.,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST'S  
MOTION TO STRIKE PORTIONS OF THE REBUTTAL EXPERT REPORT  
OF JOSEPH C. MCALEXANDER**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Strike Portions of the Rebuttal Expert Report of Joseph C. McAlexander. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the expert rebuttal report of Joseph C. McAlexander III.

3. Attached as **Exhibit 2** is a true and correct copy of Samsung’s Disclosure of Claim Terms Requiring Construction.

4. Attached as **Exhibit 3** is a true and correct copy of Samsung’s Disclosure of Proposed Constructions of Disputed Claim Terms and Supporting Evidence.

5. Attached as **Exhibit 4** is a true and correct copy of Samsung’s Disclosure of Preliminary Claim Constructions and Extrinsic Evidence.

6. Attached as **Exhibit 5** is a true and correct copy of the Joint 4-3 Claim Construction and Prehearing Statement.

7. Attached as **Exhibit 6** is a true and correct copy of an excerpt of the January 19, 2023 deposition transcript of Robert Wedig.

8. Attached as **Exhibit 7** is a true and correct copy of Plaintiff Netlist, Inc.’s First Set of Interrogatories To Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., And Samsung Semiconductor, Inc. (Nos. 1–11).

9. Attached as **Exhibit 8** is true and correct copy of Samsung’s Seventh Supplemental Objections and Responses to Netlist’s First Set of Interrogatories (Nos. 1, 2, 4,

5, 7, 9).

10. Attached as **Exhibit 9** is a true and correct copy of an excerpt of the November 11, 2022 deposition transcript of Kyungsoo Park.

11. Attached as **Exhibit 10** is a true and correct copy of an excerpt of the December 14, 2022 deposition of Seung-Mo Jung.

12. Attached as **Exhibit 11** is a true and correct copy of Netlist's First Rule 30(b)(6) Notice of Deposition of Samsung.

13. Attached as **Exhibit 12** is a true and correct copy of an email from Alma Truax-Padilla to counsel for Netlist.

14. Attached as **Exhibit 13** is a true and correct copy of an excerpt of Netlist's May 4, 2022 Preliminary Infringement Contentions.

15. Attached as **Exhibit 14** is a true and correct copy of an excerpt of the opening expert report of Joseph C. McAlexander III.

Executed on February 3, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby  
Jason G. Sheasby